

THE LAW FIRM OF
JAMES R. LAMBERT

1491 RICHMOND ROAD
STATEN ISLAND, NEW YORK 10304
TEL. (718) 983-5050
FAX. (718) 983-5088

JAMES R. LAMBERT, ESQ. *+

OF COUNSEL
TIMOTHY M. O'DONOVAN, ESQ.*+
ANDREW J. CALCAGNO, ESQ.*+
MICHELLE LAMBERT, ESQ.+

*ADMITTED IN NEW YORK
+ADMITTED IN NEW JERSEY

NEW JERSEY OFFICE
213 SOUTH AVENUE, EAST
CRANFORD, NJ 07016
(732) 414-2561

BY APPOINTMENT ONLY

June 7, 2012

Via ECF

Hon. Steven M. Gold
United States Chief Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Patrick Alford, et al v. The City of New York.
Docket Number: CV 11-01583

Rodriguez v. The City of New York
Docket Number: CV 10-04661

Dear Judge Gold:

This office represents plaintiff's Patrick Alford, Sr. and J.A. in the above referenced matter.

Pursuant to your Order of April 18th, 2012, my office served Plaintiff's Second Set of Interrogatories and Plaintiff's Third Set of Interrogatories on Defendant, The City of New York, on April 19th and April 20th, respectively. Defendant's responses were due on May 9th and May 10th, respectively. I received the City's responses to both sets of interrogatories on June 1st (Ms. Halberdier advised me that, due to a family matter, she would be serving them late). Upon reviewing same I have found certain deficiencies which I would like an opportunity to address with her, pursuant to Local Rule 37.3(a). However, your Order requires that Motions to Compel must be filed by June 8th.

Hon. Steven M. Gold

June 7, 2012

Page 2

Therefore, I am respectfully requesting that the deadline for filing Motions to Compel be extended to June 22nd, to allow me an opportunity to attempt to resolve this dispute with Ms. Halbardier.

Respectfully,

James R. Lambert

James R. Lambert

JRL:lmr

Alford, Patrick/letter to Magistrate Steven Gold 5.30.12

cc: All Counsel via ECF